

DECLARATION OF GUADALUPE LUGO

Comes now the Affiant, Guadalupe Lugo, and states as follows:

1. I am a legal assistant for the firm Sowers & Wolf, LLC. I am over the age of 21 years and am not under any disability that would bar me from testifying in a court of law.

2. In the early days of January 2010, as I was asked by attorney M. Beth Fetterman to photocopy a number of documents provided to us by defendant's counsel. The documents filled a standard banker's box (roughly 15" in length). I did not Bates-stamp or otherwise number the documents, given the sheer quantity and the need for expediency, especially when considering that many of the documents were double-sided and stapled. Mostly the documents consisted of personnel files, with some miscellaneous documents mixed in. I would estimate that I copied approximately 1,500 pages. However, our copier is unable to provide a daily tally of copies. I also spoke to the company who services our copier, and was informed our software does not track what day a certain client was created in our tracking system.

3. On May 12, 2010 I counted the number of total pages comprising Plaintiff's Exhibits, and found them to be seventy (70) pages in total.

I declare under penalty of perjury the foregoing is true and correct.

Executed on 5/12, 2010



Guadalupe Lugo

Exhibit 4